

# **ATTACHMENT 1**

## **SUPPLEMENTAL DECLARATION OF SUE STILES**

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

Andrew Bridge, et al.,

*Plaintiffs,*

v.

Oklahoma State Board of Education, et al.,

*Defendants.*

Civil Action No.: CIV-22-787-JD

**SUPPLEMENTAL DECLARATION OF SUE STILES**

I, Sue Stiles, pursuant to 28 U.S.C. § 1746 declare as follows:

1. My name for the purposes of the above-captioned action is Sue Stiles, a pseudonym.<sup>1</sup> I am the mother of Sarah Stiles, one of the minor plaintiffs in this lawsuit. I am over the age of eighteen (18) and make this declaration of my own personal knowledge, and, if called as a witness, I could and would testify competently to the matters stated herein.

2. I re-affirm all that I declared in my previous Declaration, submitted to this Court on September 29, 2022. *See* ECF No. 24-6.

3. Since September 29, 2022, my daughter Sarah has continued to attend Independence Charter Middle School (“ICMS”), which is part of Harding Independence Charter District, Inc. (“HICD”).

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<sup>1</sup> Sue Stiles, Sarah Stiles, and Steve Stiles are pseudonyms. My daughter (who is a minor), my husband, and I are proceeding under pseudonyms to protect my daughter’s right to privacy and to protect her from discrimination, harassment, and violence, as well as retaliation for seeking to protect her rights.

4. On September 27, 2022, the principal of ICMS informed students' parents of a modification of the ICMS student restroom policy. I received a text message from the principal which read:

Independence Chart: Patriot Families:

Due to the amount of instructional time that is being missed when students are leaving class, I have told the students they must use the restroom and get drinks during passing periods. We, of course, realize there will be exceptions to this. Since these will be the exceptions and not the rule, we will deal with those situations as they come up on a case-by-case basis.

5. On the same day, my daughter Sarah was pulled aside by a teacher, who informed her that she was the exception to this new rule and that Sarah would be permitted to use the restroom during class.

6. This new policy has negatively impacted Sarah, and I worry about the additional risks that it poses to her health and well-being.

7. As I explained in my previous Declaration, ICMS's restroom policies have already had a negative impact on Sarah. Under the previous policy, Sarah had been questioned by another student about her use of the single-occupancy restroom. Sarah was bullied at her previous school for being transgender, and she is anxious that ICMS's policies will cause other students to learn she is transgender, leading to more bullying. I am anxious too.

8. This policy modification only adds to this anxiety. Sarah and I are worried that students will question why the time-limits on restroom use do not apply to Sarah or why Sarah continues to use the single-occupancy restroom.

9. Sarah and I are worried that, under the modified policy, students will put

two and two together and realize she is transgender. We worry that even if students do not realize that Sarah has an exception because she is transgender, they will assume she has medical issues requiring special treatment and bully her for that.

10. ICMS's policy forces Sarah to use the restroom in a way that puts a spotlight on her restroom use. This is embarrassing and cruel.

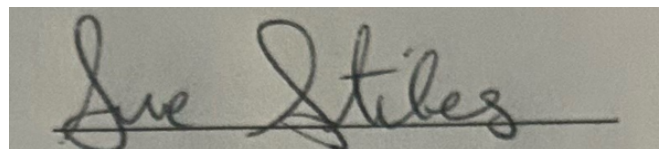
11. ICMS's modified restroom policy also stigmatizes Sarah. I want my daughter to feel like she belongs when she is at school. The modified policy continues to single out Sarah, treating her as different from other students. No one deserves to have a policy call attention to her – and only her – use of the restroom.

12. Since my previous Declaration, Sarah has continued to use women's restrooms in settings outside of school. To my knowledge, there has never been an incident or complaint by anyone regarding Sarah's restroom usage in those settings.

13. Sarah deserves to go to a school where she feels like she belongs, not one whose policies single her out as different and risk revealing her transgender status against her will. School is hard enough, and ICMS's modified bathroom policy simply provides another way in which students can single out others.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on December 1, 2022.

A handwritten signature in black ink, reading "Sue Stiles", written over a horizontal line.

Sue Stiles